

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 05-11745RWZ

BARBARA DEIGHTON HAUPT, Trustee)
of BD REALTY TRUST,)
Plaintiff)
v.)
THE TOWN OF WAREHAM acting by)
and through the BOARD OF)
SELECTMEN OF THE TOWN OF)
WAREHAM, and the BOARD OF)
SELECTMEN OF THE TOWN OF)
WAREHAM,)
Defendants)

**JOINT MOTION TO EXTEND PARTIES' DESIGNATION OF EXPERTS AND
DISCLOSURE OF EXPERT REPORTS AND ANTICIPATED TESTIMONY**

Now come the Plaintiff, Barbara Deighton Haupt, Trustee of BD Realty Trust ("the Trust"), and the Defendants, the Town of Wareham acting by and through the Board of Selectmen of the Town of Wareham, and the Board of Selectmen of the Town of Wareham (collectively, "the Town"), and jointly move this Honorable Court to extend the parties' deadlines for designation of experts and disclosure of expert reports by fourteen (14) days as follows:

1. The Trust shall designate its experts and disclose expert reports to the Town by Wednesday, March 29, 2006.
2. The Town shall designate its experts and disclose expert reports to the Trust by Thursday, June, 29, 2006.

For reasons, the parties state that an additional fourteen (14) days beyond that ordered by the Court (as indicated in the Notice of Electronic Filing dated November 15, 2005) is necessary to coordinate multiple expert reports and opinions to allow for a complete disclosure pursuant to Fed. R. Civ. P. 26(a)(2).

WHEREFORE, the parties respectfully request that their motion be allowed, and that this Court enter forthwith a new docket entry as proposed by the parties herewith.

BARBARA DEIGHTON HAUTP,
Trustee of BD REALTY TRUST
By its attorney,

/S/ Kristen M. Ploetz, Esq.

Jeffrey T. Angley, Esq.

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TOWN OF WAREHAM, acting by and
through the Board of Selectmen of the
Town of Wareham and the BOARD OF
SELECTMEN OF THE TOWN OF
WAREHAM,
By their attorney,

/S/ Jeffrey T. Blake (by KMP)

Jeffrey T. Blake, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on this 14th day of March, 2006.

/S/ Kristen M. Ploetz

Kristen M. Ploetz, Esq.